

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Amendment of Section 73.202(b)

FM Table of Allotments

FM Broadcast Stations

(Keeseville, New York and Hartford and

White River Junction, Vermont)

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)
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)

MM Docket No. 02-23

RM - 10359

RM - 10434

To: Media Bureau

REPLY TO OPPOSITION TO MOTION TO STRIKE

Great Northern Radio, LLC, licensee of WSSH(FM), White River Junction, Vermont, and Family Broadcasting, Inc., licensee of WWOD(FM), Hartford, Vermont (collectively, the "Joint Petitioners"), by their counsel, hereby submit their Reply to the "Opposition to Motion To Strike" ("Opposition") filed by Hall Communications, Inc. ("Hall") in this proceeding. The Commission must dismiss Hall's defective Opposition for continued failure to comply with Sections 73.315(a) and 73.315(b) of the Commission's Rules. Instead, the Commission should amend the FM Table of Allotments to modify the Hall Counterproposal by substituting Channel 231A for Channel 282A as a vacant allotment at Keeseville. This substitution is a win-win situation that eliminates the mutual exclusivity between the Hall Counterproposal and the Joint Petitioners' original rule making proposal for Keeseville and Hartford, thereby enabling the Commission to grant both proposals. In support thereof, the following is respectfully submitted.

Introduction

1. This rule making proceeding involves two mutually exclusive rule making proposals filed by the Joint Petitioners and Hall. The Commission commenced the rule making proceeding in response to a petition for rule making filed by the Joint Petitioners proposing changes to the

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FM Table of Allotments for Keeseville, New York and Hartford and White River Junction, Vermont and modification of the licenses of WWOD(FM) and WSSH(FM) accordingly.¹ The petition represents a preferential arrangement under the FM priorities because it would provide a first local service to Keeseville.

2. Hall filed a counterproposal in the rule making proceeding, proposing the allocation of Channel 282A to Keeseville (the "Hall Counterproposal") as a vacant allotment. The Hall Counterproposal is mutually exclusive with the Joint Petitioners' proposal to change the community of license for WWOD(FM) to Keeseville. Numerous pleadings have addressed the merits of the Hall Counterproposal, and are summarized below.

3. On May 21, 2002, the Joint Petitioners timely filed Reply Comments seeking dismissal of the Hall Counterproposal for failing to comply with Sections 73.315(a) and 73.315(b).² The Joint Petitioners used actual terrain calculations to demonstrate that the Hall Counterproposal would not provide the required city-grade signal or line-of-sight coverage over Keeseville. Hall, on the other hand, relied upon a less accurate computer database in making its calculations. As a result, Hall underestimated the actual height of the terrain obstruction between the proposed tower site and Keeseville by over 100 feet and failed to account for actual terrain variations that would prevent the Hall Counterproposal from providing a 70 dBu signal over the entire community of Keeseville. The Hall Counterproposal compounded its mistake by

¹ See *In the Matter of Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Keeseville, New York and Hartford and White River Junction, Vermont), Notice of Proposed Rule Making*, MM Docket No. 02-23 RM-10359 (rel. February 8, 2002) ("NPRM").

² In its Opposition, Hall argues that its counterproposal is technically correct and substantially complete simply because Hall provided the specific channel and class, specific transmitter site coordinates, and engineering studies that which indicate that the station would meet the minimum separation and city grade requirements. However, the Commission has dismissed rule making proposals that were not technically correct and substantially complete for other reasons. See *Parker, Arizona*, 17 FCC Rcd 9578 (Aud. Div. 2002) (failure of rule making proponent to state willingness to file application and to submit statement from third party licensee consenting to tower site change render rule making proposal unacceptable); *Bethel Springs, Tennessee*, 16 FCC Rcd 20329 (Alloc. Br. 2001) (failure to consent to transmitter site change rendered rule making petition unacceptable);

specifying an antenna height of 371.5 meters AMSL, which would place the antenna 3.4 meters below ground, because the actual terrain at the proposed tower site is 374.9 meters AMSL. The Joint Petitioners cross-verified their results by considering other representative tower locations for Channel 282A, but none of these tower locations satisfied the provisions of Section 73.315.

4. On June 3, 2002 Hall attempted to cure its defective counterproposal by submitting an unauthorized pleading. Hall did not address the merits of the Joint Petitioners' Section 73.315(a) arguments, claiming that Hall's reliance upon standard propagation methodology was sufficient. Hall ridiculed Joint Petitioners' technical statement with respect to Section 73.315(b), arguing that since Hall never intended to build an antenna below ground, somehow the Joint Petitioners erred in calculating the antenna height. Hall nonetheless proposed to increase the antenna height substantially to either 114 or 190 meters AGL to overcome the line-of-sight problems identified by Joint Petitioners. Unfortunately, Hall continued to rely upon a computer database to make its calculations, thereby once again underestimating the height of the terrain obstruction by more than 100 feet.³ Hall claimed that constructing a new tower would pose no problem because the proposed tower site was located outside of the Adirondack State Park.

5. On July 26, 2002, the Joint Petitioners filed a Motion to Strike Hall's pleading as unauthorized, and in the alternative, requested leave to file comments to address Hall's substantially modified counterproposal. The Joint Petitioners noted that the Hall Counterproposal specifically lists the antenna height as 371.5 meters AMSL, and the Joint Petitioners relied upon that representation in determining compliance with Section 73.315. That the proposed antenna

Susquehanna and Hallstead, Pennsylvania, 15 FCC Red 24160 (Alloc. Br. 2000) (rule making proposal that did not comply with Sections 73.315(a) and (b) dismissed as unacceptable).

³ Given that the Joint Petitioners Reply Comments of May 21, 2002 advised Hall of their error in calculating the height of the terrain obstruction, it is puzzling as to why Hall continued to rely upon a computer database that did not provide the actual height of the terrain obstruction. It is even more puzzling why Hall proposed antenna heights that would not provide the line-of-sight coverage to Keeseville, when actual terrain obstructions are taken into account.

would be located underground was due to Hall's error, not the Joint Petitioners'. The Joint Petitioners submitted a technical statement showing that even at a proposed antenna height of 114 meters AGL or 190 meters AGL, the Hall Counterproposal still would not provide the required line-of-sight coverage to Keeseville. In fact, the Hall Counterproposal would require an antenna height of 1,120 feet AGL to provide line-of-sight coverage to Keeseville. The Joint Petitioners provided a map showing that Hall's proposed tower site would be located within the Adirondack State Park, that Hall did not have reasonable assurance from the Adirondack Park Agency (the "Park Agency") to construct a new tower, and that construction of a tower over 40 feet in height would be difficult. Hall relied upon a 1964 map in determining the boundaries of the Adirondack State Park.

6. On August 8, 2002, Hall filed its Opposition to the Motion to Strike, which does not challenge the Joint Petitioners' technical showing that the Hall Counterproposal, even as modified, will not comply with Section 73.315(b). Nor does Hall challenge the Joint Petitioners' position that the Hall Counterproposal would require an antenna height of more than 1,120 feet to provide unobstructed line-of-sight coverage. Instead, Hall argues that compliance with Section 73.315(b) is sufficient to demonstrate compliance. Hall submits for the first time a Longley-Rice technical study in an effort to demonstrate compliance with Section 73.315(a). Hall now acknowledges that the proposed tower site is indeed located within the Adirondack State Park, but now claims that the rules of the Park Agency will permit Hall to construct a new tower. Hall proposes to modify the proposed antenna height for a third time, now to 30 feet. Hall continues to rely upon the same flawed computer databases to support its technical statement.

1. The Hall Counterproposal Does Not Comply With Section 73.315

7. The primary disagreement between the Joint Petitioners and Hall is whether the Hall Counterproposal complies with Sections 73.315(a) and 73.315(b) of the Commission's Rules. This disagreement arises because the parties use different methodologies to determine compliance with this rule. The Joint Petitioners used *actual terrain calculations*, whereas the Hall Counterproposal and its various modifications, relied upon *average* terrain calculations to determine compliance with Section 73.315(a) and an *interpolated* terrain database to determine compliance with 73.315(b). Hall's measurements are far less precise than actual terrain measurements, as demonstrated by the fact that the original antenna height specified in the Hall Counterproposal would be located underground.

8. The use of actual terrain measurements is required for showing compliance with Section 73.315(b) and is permissible for Section 73.315(a). The Joint Petitioners have shown beyond any doubt that actual terrain calculations demonstrate that the Hall Counterproposal, and its subsequent modifications, does not provide the required line-of-sight coverage to Keeseville. Hall does not use actual terrain calculations in any of its technical statements to show compliance with Section 73.315(b). Hall does not even attempt to refute this showing in its Opposition. Instead, Hall now argues for the first time that compliance with Section 73.315(b) necessarily follows if the Hall Counterproposal satisfies the requirements of Section 73.315(a). Hall claims that if through the combined use of standard propagation methodology and an alternative propagation methodology study such as Longley-Rice, it can show compliance with Section 73.315(a), then compliance with Section 73.315(b) is not required. Hall claims that Commission precedents support this interpretation. Such reasoning would nullify the independent requirement of Section 73.315(b), and thus, Hall's argument has no merit.

9. Hall submits the Longley-Rice study as an alternative methodology propagation study to demonstrate compliance with Section 73.315(a).⁴ However, in order to make such a submission, Hall must demonstrate that it has reasonable assurance to construct the new tower and FAA approval for the new tower site.⁵ Hall has provided evidence of neither. All Hall provides is a generic policy statement from the Park Agency on their policies for approving new tower construction. Hall claims that the tower site is located on land specified by the Agency for rural use and permissible for telecommunications towers. Even if this information is correct, it does not constitute evidence of reasonable assurance on the part of Hall to construct the proposed tower.⁶ The failure to secure FAA approval and reasonable assurance from the Park Agency renders the Longley-Rice study, and the Hall Counterproposal, defective.⁷

10. The Longley-Rice study suffers from the same technical defects as Hall's prior technical statements to show compliance with Section 73.315(a).⁸ Contrary to Hall's claims, the Longley-Rice study relies upon a 3-second terrain database, rather than actual terrain, and thus Hall continues to underestimate the actual height of the terrain obstruction between the antenna site and Keeseville by more than 100 feet, as well as the surrounding terrain.⁹ As applied here, the Longley-Rice study is defective for the same reasons that Hall's reliance upon standard propagation methodology is defective.¹⁰

⁴ Hall's reliance upon an alternative methodology propagation study such as Longley-Rice contradicts its previous arguments that the Commission should not consider such studies because compliance with standard propagation studies is sufficient for Section 73.315(a) purposes. Although the Joint Petitioners have provided adequate justification, both factual and in Commission precedent for the use of actual terrain calculations, Hall's reliance here upon Longley-Rice further supports the use of alternative methodology in this proceeding.

⁵ See *Brighton and Stowe, Vermont*, 16 FCC Rcd 8537 (Alloc. Br. 2001); *Woodstock and Broadway, Virginia*, 3 FCC Rcd 6398 (1988).

⁶ See *Twin Falls and Hailey, Idaho*, 13 FCC Rcd 20172 (Alloc. Br. 1998) (rejecting proposed transmitter site on U.S. Forest Service land absent reasonable assurance of site availability).

⁷ See *Id.*

⁸ See *Engineering Statement of Robert M. Smith* attached hereto as Exhibit 1 ("*Smith Engineering Statement*").

⁹ See *Id.* at 1.

¹⁰ See *Id.* at 1.

11. Assuming, *arguendo*, that Hall is correct that some combination of standard propagation methodology and an alternative propagation methodology showing compliance with Section 73.315(a) may relieve Hall of its obligation to comply with Section 73.315(b), then the Commission must consider all alternative propagation studies submitted as part of this proceeding, including the two studies previously submitted by the Joint Petitioners on May 21 and July 26 of this year. When the Commission considers the actual terrain calculations already provided by the Joint Petitioners, there can be no doubt that the Hall Counterproposal does not satisfy the requirements of Section 73.315(a) and therefore must be dismissed.

II. The Joint Petition and Hall Counterproposal Are Not Mutually Exclusive

12. Hall and Montpelier Broadcasting, Inc. repeatedly argue that the allocation of a new channel to Keeseville would better serve the public interest than relocating WWOD(FM) to Keeseville as a first local service.¹¹ The Joint Petitioners infer that Hall and MBI would support a technical solution that permits the Commission to grant both rule making proposals. The Joint Petitioners assume that Hall and MBI would fully support a solution that would make a vacant allocation available to Keeseville as well as one that would permit the proposed changes in the FM Table of Allocations to the communities of Hartford, Keeseville and White River Junction.

13. The Joint Petitioners, in the interest of reaching an amicable solution to this matter, have conducted a technical study, and have determined that by substituting Channel 231A for Channel 282A in the Hall Counterproposal, the Commission can grant the Joint Petitioners' and Hall's rule making proposals.¹² The substitution of Channel 231A for the Hall Counterproposal eliminates the mutual exclusivity between the two rule making proposals. The Commission can

¹¹ Montpelier Broadcasting, Inc. ("MBI") filed comments supporting the Hall Counterproposal and opposing the Joint Petitioners' rule making petition.

allocate Channel 231A as a vacant allotment to Keeseville, reallocate Channel 282C3 from Hartford to Keeseville and modify the license of WWOD(FM) accordingly, and reallocate Channel 237A from White River Junction to Hartford and modify the license of WSSH(FM) accordingly. In this manner, each party is satisfied. *Everybody wins.*

14. The substitution of Channel 231A better serves the public interest than the Channel 282A contained in the Hall Counterproposal. The proposed tower site for Channel 231A is located significantly closer to Keeseville than the proposed tower site for Channel 282A specified in the Hall Counterproposal. The proposed tower site for Channel 231A complies with all the Commission's technical rules, including Sections 73.315(a) and 73.315(b).¹³ There are fewer technical restrictions for operation of a FM radio station on Channel 231A than for Channel 282A, meaning that the station can provide a better signal to Keeseville and the surrounding area. Whereas selecting between either the Joint Petitioners' rule making proposal or the Hall Counterproposal would require choosing between mutually exclusive rule making proposals with respect to providing new service to the public, the Joint Petitioners' instant proposal will introduce two new services to the public.

15. The Joint Petitioners are certain that Hall and MBI are eager to resolve this proceeding in an expeditious manner to provide service to the public and will embrace the proposed allocation of Channel 231A at Keeseville. The Joint Petitioners are confident that Hall and MBI will agree that a technical solution that enables the Commission to grant both rule making proposals better serves the public interest than a protracted administrative proceeding that delays service to the public, permits the grant of only one proposal, and needlessly consumes the Commission's resources. Accordingly, the Joint Petitioners propose that all four parties file a

¹² See *Smith Engineering Statement* at 2.

¹³ See *Id.*

joint motion with the Commission seeking approval of the proposed changes in the FM Table of Allotments as proposed in Section II and withdrawing all other pleadings in this proceeding. If Hall and MBI sincerely wish to provide new service to Keeseville, then there is no reason that the parties can not file the necessary pleading with the Commission within the next 30 days and that this proceeding could be resolved by the end of the year. If for some unforeseeable reason Hall and MBI reject this technical solution, then the Joint Petitioners renew their call for dismissal of the Hall Counterproposal as defective for the reasons stated in this proceeding.

16. The Joint Petitioners note that their rule making petition complies with the Commission's technical and policy rules, complies with international treaty, does not provide service to an urbanized area, and permits licensing of commercial radio stations to the communities of White River Junction and Hartford. The petition will permit WSSH(FM) to provide improved service to the public, and operate no longer as a grandfathered Class A facility but as a fully spaced Class A facility. Since no change in tower location is proposed for WSSH(FM), White River Junction will continue to receive 70 dBu service from Keeseville.¹⁴

Conclusion

The Joint Petitioners proposed the following amendments to the FM Table of Allotments:

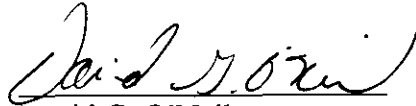
| <u>Location</u> | <u>Current Allocation</u> | <u>Proposed Allocation</u> |
|--------------------------|----------------------------------|-----------------------------------|
| Hartford, VT | 282C3 | 237A |
| Keeseville, NY | ----- | 282C3, 231A |
| White River Junction, VT | 237A | ----- |

¹⁴ Hall and MBI repeatedly have made allegations that the proposed reallocation of WSSH(FM) to Hartford will deprive White River Junction of its sole FM service. Since WNHV(AM) remains licensed to White River Junction, this argument has no legal relevance. However, the fact that WSSH(FM) will not change transmitter site and will be able to operate with improved facilities from its present transmitter site, means that WSSH(FM) will continue to provide FM service to White River Junction. Therefore, MBI and Hall's concerns on this matter have been addressed.

This proposal better serves the public interest by providing new and improved services to the public. It permits the Commission to grant both the Joint Petitioners' rule making petition and the Hall Counterproposal. The proposal eliminates the necessity for the Commission to select among mutually exclusive proposals, thereby conserving the Commission's resources and expediting new and improved services to the public.

WHEREFORE, FOR THE FOREGOING REASONS, Great Northern and Family Broadcasting respectfully request that the Commission dismiss the Opposition to Motion to Strike filed by Hall as defective and instead grant the proposed changes to the FM Table of Allotments specified in this pleading, and modify Section 73.202(b) accordingly. In the alternative, the Joint Petitioners respectfully request that the Commission dismiss the Hall Counterproposal and grant the Joint Petitioners' rule making petition as originally proposed.

**GREAT NORTHERN RADIO, LLC
FAMILY BROADCASTING, INC.**



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Their Counsel

September 3, 2002

EXHIBIT 1

30134997.6

R. M. SMITH ASSOCIATES

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ENGINEERING STATEMENT

IN SUPPORT OF
REPLY BY
GREAT NORTHERN RADIO, LLC
AND
FAMILY BROADCASTING, INC

ON AN OPPOSITION MOTION TO STRIKE
BY
HALL COMMUNICATIONS, INC.

August 2002

PURPOSE AND SCOPE

The Reply, of which this Statement is a part, are being filed in response to an Opposition to a Motion to Strike ("Opposition") filed by Hall Communications, Inc. ("Hall") on August 8, 2002 in the matter of a Notice of Proposed Rule Making in MM Docket No. 02-23, RM-10359.

This Statement addresses the further information provided in Hall's Opposition and shows that an alternative frequency is available to satisfy Hall's desire to have a channel serving Keeseville that would be open to Public auction. This available channel is not mutually exclusive with the Petitioners' request to allot 282C3 to Keeseville.

DISCUSSION OF HALL'S SUPPLEMENTAL SHOWING

The Petitioners' Reply Comments to Hall's Counterproposal demonstrated that the Hall Counterproposal is defective in that it failed to specify an allotment site that provided unobstructed line of sight to Keeseville, NY. After first disputing this fact, Hall now apparently accepts it, but claims that line of sight is irrelevant because their Longley-Rice study shows Keeseville will still receive 70 dBu coverage from their counterproposal facility.

First, the Longley-Rice study submitted is based upon the same flawed terrain data that led Hall's engineer to originally claim line of sight was possible from the selected site. That claim and the underlying terrain database were shown to be inaccurate by the Petitioner in its Motion to Strike filed July 26, 2002. The inaccuracy in the terrain database used by Hall for both its line of sight and Longley-Rice studies understates the altitude of some of the terrain between Hall's site and Keeseville by more than 100 feet. This inaccuracy was definitively demonstrated in the Engineering Statement contained in the Petitioners' Motion to Strike of July 26, 2002, and that Statement is incorporated herein. The Longley-Rice study's results are flawed because they rely upon the same flawed terrain data used in their previous technical submissions

Second, the F.C.C. Rules in 47 C.F.R. § 73.315 do not say a major obstruction is permissible if 70 dBu coverage can be demonstrated. Paragraph (b) of that section states "...The location of the antenna should be so chosen that line-of-sight can be obtained from the antenna over the principle city or cities to be served; in no event should there be a major obstruction in this path" (emphasis added). Hall would like us to believe that demonstrating 70 dBu coverage (albeit with a flawed terrain database) over Keeseville negates the necessity to provide a site with line of sight to the community. The line of sight provision in the F.C.C. Rules assures that the city of license not only

receives an unattenuated signal, but also receives a signal free of multi-path distortion and fading. Complying with 47 C.F.R. § 73.315(a) assures adequate signal level. Complying with 47 C.F.R. § 73.315(b) assures the reliability and quality of the RF signal over the community of license. Complying with both paragraphs, not just one or the other, is required.

ALTERNATIVE SOLUTION

Granting the Petitioners' request to move the allotment of channel 282C3 from Hartford, VT to Keeseville, NY and providing a Class A channel to Keeseville, open to auction, as is the stated goal of Hall, can both be accomplished. The Commission can substitute channel 231A for the channel specified in the Hall Counterproposal and grant both the Petition and Counterproposal.

Channel 231A can be allotted to Keeseville, NY as the second local service^{1/} with reference coordinates at N44-30-38, W73-32-18. A computerized search of the CDBS database (attached) shows that a Class A facility at that location is fully spaced to all domestic FM facilities and/or allotments.

A Class A facility at that location is short spaced to Canadian station CKMF-FM, 232C1, Montreal, QU. This channel can be inserted into the Table of Allotments as a specially negotiated short-spaced allotment.^{2/} Limiting the ERP of the channel 231A allotment to 1.0 kW at 199 meters HAAT or equivalent toward Montreal at 357.7° True will prevent the 48 dBu F(50,10) contour from crossing the U.S./Canadian border and will fully protect CKMF-FM as required by treaty. This restriction will have no impact upon the coverage of Keeseville, NY.

These theoretical coordinates are located just 4.3 kilometers from the center of Keeseville, and 5.3 kilometers from the furthest point in Keeseville. Unlike the Hall Counterproposal site, this site has unobstructed line of sight into Keeseville. Keeseville would be located well within the antenna maxima (the antenna minima is centered at 357.7° True, Keeseville is at 99° True) and so would receive well in excess of 70 dBu F(50,50) coverage.

^{1/} WWOD(FM), 282C3 would be the first local service to Keeseville, NY, as proposed in the Petition.

^{2/} Hall's Counterproposal also specified a specially negotiated short-spaced allotment with respect to Canadian facilities. The Hall Counterproposal specified a directional antenna with an ERP of less than 0.200 kW toward Canada. This alternative channel allows the use of five times more ERP toward Canada.

SUMMARY

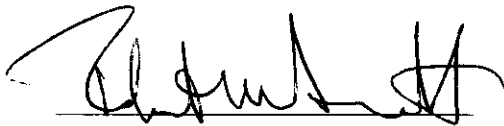
Hall's Counterproposal remains defective in that it fails to comply with 47 C.F.R. § 73.315(a) and (b) and so cannot be granted.

The Proposal filed by the Petitioners complies with all F.C.C. Rules and policies, and can be granted.

An alternative channel exists that satisfies Hall's often-stated desire to have an "auction available" allotment specified for Keeseville. This alternative channel is not mutually exclusive with a grant of the Petition as originally proposed. The alternative channel and site is far less restricted toward Canada than Hall's Counterproposal.

CERTIFICATION

I, Robert M. Smith Jr., of Port St. Lucie, FL, do hereby certify that all of the data, calculations and statements in this application are true and correct to the best of my knowledge and belief. I further certify that I am an experienced and qualified broadcast engineer and that my qualifications are a matter of record with the Commission.

A handwritten signature in black ink, appearing to read 'Robert M. Smith Jr.', written over a horizontal line.

Robert M. Smith Jr.

FM SPACING STUDY

Title: Channel 231A Allotment Site for Keeseville, NY

Channel Studied: 231
Safety Zone (km): 50

Latitude: 44-30-38
Longitude: 073-32-18

| Chan Freq Auth. | City Licensee FCC File No. | St Call | ERP-kW EAH-m | Latitude Longitude Facility ID | Dist Br-To | Required Clearance Result |
|-----------------------|------------------------------------|-----------------|-----------------|--------------------------------------|---------------|---------------------------------|
| 231A | WHITEHALL | NY WNYV | 3.0 | 43-28-37 | 115.1 | 115 |
| 94.1 | PINE TREE BROADCASTING COMPANY | | 100 | 73 -26-56 | 176.4 | .1 |
| LIC | BLH-19900726KA | | | 52637 | | CLOSE |
| 231C3 | CANAAN | VT WXXM | 16.0 | 44-58-40 | 151.8 | 142 |
| 94.1 | VECTOR BROADCASTING INC. | | 118 | 71 -44-13 | 70.0 | 9.8 |
| CP M-DA | BMPH-19900806IG | 73.215 Utilized | | 69846 | | CLOSE |
| 230A | MORRISVILLE | VT WLVB | 5.4 | 44-34-42 | 72.1 | 72 |
| 93.9 | RADIO VERMONT, INC. | | 37 | 72 -38-9 | 84.0 | .1 |
| LIC | BLH-19930907KB | | | 54868 | | CLOSE |
| 232C1 | MONTREAL | QU CKMFFM | 92.0 | 45-30-20 | 110.7 | 168 |
| 94.3 | - | | 299 | 73 -35-32 | 357.8 | -57.3 |
| | | | | 94323 | | SHORT |
| 228C1 | MONTREAL | QU CBMFM | 24.5 | 45-30-20 | 110.7 | 90 |
| 93.5 | - | | 251 | 73 -35-32 | 357.8 | 20.7 |
| | | | | 96691 | | CLEAR |
| 230C1 | OTTAWA | ON CKKL | 95.0 | 45-30-11 | 213.1 | 168 |
| 93.9 | - | | 328 | 75 -51-2 | 301.2 | 45.1 |
| | | | | 96799 | | CLEAR |
| 284C2 | MONTPELIER | VT WNCS | 1.9 | 44-25-14 | 57.4 | 15 |
| 104.7 | MONTPELIER BROADCASTING, INC. | | 634 | 72 -49-42 | 100.0 | 42.4 |
| LIC | BLH-19991001AAD | | | 43655 | | CLEAR |
| 234C2 | CHATEAUGAY | NY WYUL | 50.0 | 44-46-56 | 61.9 | 55 |
| 94.7 | CARTIER COMMUNICATIONS INC. | | 137 | 74 -13-9 | 299.2 | 6.9 |
| LIC | BLH-20010222AAN | | | 69847 | | CLOSE |
| 229C3 | ADDISON | VT WXAL-FM | 25.0 | 44-1 -34 | 61.6 | 42 |
| 93.7 | ADDISON BROADCASTING COMPANY, INC. | | 88 | 73 -9 -44 | 150.8 | 19.6 |
| LIC | BLH-20010718AAN | | | 83867 | | CLEAR |

Certificate of Service

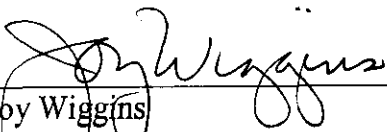
I, Joy Wiggins, a secretary in the law firm of Manatt, Phelps and Phillips, LLP, do hereby certify that on this 3rd day of September, 2002, I caused copies of the foregoing "Reply to Opposition to Motion to Strike" to be delivered by first-class mail, unless otherwise specified, to the following persons:

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